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Kurt A. Gustafson, Francois Lebel, William L. Ashton,
Nora E. Brennan, Seth H.Z. Fischer, Jeffrey L. Vacirca,
Dolatrai M. Vyas, Bernice R. Welles, Stuart Krassner,
Raymond W. Cohen, Gilles R. Gagnon, Anthony E.
Maida, and Elizabeth A. Czerepak and for
Nominal Defendant Spectrum Pharmaceuticals Inc*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MARK CSABA, Derivatively on Behalf of
SPECTRUM PHARMACEUTICALS INC.,

Plaintiff,

v.

JOSEPH W. TURGEON, KURT A.
GUSTAFSON, FRANCOIS LEBEL,
WILLIAM L. ASHTON, NORA E.
BRENNAN, SETH H.Z. FISCHER, JEFFREY
L. VACIRCA, DOLATRAI M. VYAS,
BERNICE R. WELLES, STUART
KRASSNER, RAYMOND W. COHEN,
GILLES R. GAGNON, ANTHONY E.
MAIDA, AND ELIZABETH A. CZEREPAK,

Defendants,

and

SPECTRUM PHARMACEUTICALS INC.,

Nominal Defendant.

CASE NO. 2:21-CV-02202-JCM-BNW

**STIPULATION AND
ORDER GRANTING DISMISSAL OF
PLAINTIFF'S VERIFIED DERIVATIVE
COMPLAINT**

Plaintiff Mark Csaba, ("Plaintiff") derivatively and on behalf of nominal defendant Spectrum Pharmaceuticals Inc. ("Spectrum" or the "Company"), and defendants Joseph W. Turgeon, Kurt A. Gustafson, Francois Lebel, William L. Ashton, Nora E. Brennan, Seth H.Z. Fischer, Jeffrey L. Vacirca, Dolatrai M. Vyas, Bernice R. Welles, Stuart Krassner, Raymond W.

Cohen, Gilles R. Gagnon, Anthony E. Maida, and Elizabeth A. Czerepak (“Defendants” and together with the Plaintiff and Spectrum, the “Parties”) jointly submit this Stipulation (“Stipulation”), and in support thereof state as follows:

WHEREAS, on December 15, 2021, Plaintiff filed the above-captioned action purportedly in the right, and for the benefit, of Spectrum against Defendants (the “Action”);

WHEREAS, on or about July 31, 2023, Spectrum completed a merger transaction that resulted in Plaintiff no longer being a stockholder of the Company and, accordingly, no longer having standing to pursue derivative claims on the Company’s behalf; and

WHEREAS, the Parties hereby certify that no compensation in any form has passed directly or indirectly to Plaintiff or its attorneys in the Action and no promise to give any such compensation has been made;

IT IS HEREBY STIPULATED AND AGREED by the parties hereto that pursuant to Federal Rules of Civil Procedure 23.1(c) and 41(a), this Action is dismissed.

JULIE & HOLLEMAN LLP

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Attorneys for Plaintiff

IT IS SO ORDERED.


UNITED STATES DISTRICT COURT JUDGE

DATED: October 23, 2024

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